

245047

DEPT. OF TRANSPORTATION

03 JUN -5 11:33

BRIDGESTONE AMERICAS HOLDING, INC.

535 Marriott Drive
Nashville, TN 37214
Phone: 615-937-1450
Fax: 615-937-1422

April 29, 2003

NHTSA-2003-15328-2

RECEIVED
NATIONAL DC 20590
103 MAY -5 P 12:27
CHIEF OF COUNSEL

Ms. Jacqueline Glassman, Esq.
Chief Counsel
National Highway Traffic Safety Administration
Suite 5219
400 Seventh Street, S.W.
Washington, DC 20590

Re: Request for Approval Per FMVSS 574.5

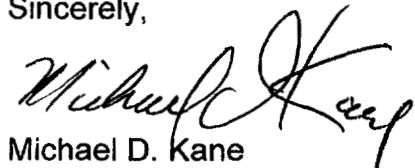
Dear Ms. Glassman:

Bridgestone/Firestone has been exploring laser technology as a means of etching the tire identification number into the tire sidewall. A diode pumped solid state laser beam etches tire letters or numerals into the rubber to the required character heights and depths. This technology avoids the risk to plant personnel in making the weekly serial change in the top half of the tire mold which has been a safety concern to both the tire industry and NHTSA.

The laser etched characters are permanent and we believe the characters are sharp, easy to read and conform to the letter styles specified in the Notes to Figure 1 in §574.5. The characters are not "molded" as mentioned in the Notes, but they are permanent. We have noted that FMVSS 139 §5.5 states that the tire must be "marked" with certain information rather than "permanently molded," which was the former language in FMVSS 109 §4.3.

With this letter, we are also enclosing samples of the laser etching for your review and are requesting approval as set out in the Notes from §574.5 for the use of laser technology for the tire identification number.

Sincerely,



Michael D. Kane
Vice President, Quality Assurance